

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION

OLIVIA Y., et al. PLAINTIFFS,

VS. CIVIL ACTION NO. 3:04CV251LN

HALEY BARBOUR, et al. DEFENDANTS.

30(b)(6) DEPOSITION OF NANCY MEADORS

Taken at the offices of Bradley, Arant, Rose & White, LLP,  
on Tuesday, May 16, 2005, beginning at 8:40 A.M.

REPORTED BY:

REBECCA A. KIDDER

State Wide Reporters

4400 Old Canton Road, Suite 201 (39211)

Post Office Box 14113

Jackson, Mississippi 39236

Telephone: (601) 366-9676

Fax: (601) 366-9756



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION

OLIVIA Y., et al.

PLAINTIFFS

V.

CIVIL ACTION NO. 3:04CV251LN

HALEY BARBOUR, et al.

DEFENDANTS

**DEPOSITION OF ROBIN WILSON**

Taken at the instance of the Plaintiffs at Bradley  
Arant Rose & White, 188 East Capital Street,  
Jackson, Mississippi, on, May 16, 2005, beginning at  
2:11 p.m.

**APPEARANCES:**

**ERIC THOMPSON, ESQ.**

**TARA S. CREAN, ESQ.**

Children's Rights

404 Park Avenue South, 11th Floor

New York, New York 10016

**COUNSEL FOR PLAINTIFFS**

**BETTY MALLETT, ESQ.**

McGlinchey Stafford

200 South Lamar Street

Jackson, Mississippi 39201

**COUNSEL FOR DEFENDANTS**

**REPORTED BY: Dawn A. Johnson**

CSR - MS #1579

Breud Court Reporting

106 Knollwood Lane

Clinton, Mississippi 39056

**COPY**

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
3 JACKSON DIVISION  
4

5 OLIVIA Y., et al. PLAINTIFFS,  
6

7 VS. CIVIL ACTION NO. 3:04CV251LN  
8

9 HALEY BARBOUR, et al. DEFENDANTS.  
10

11 30(b)(6) DEPOSITION OF GAIL YOUNG  
12

13 Taken at the offices of Bradley, Arant, Rose & White, LLP,  
14 on May 16, 2005, beginning at 1:34 P.M.  
15  
16  
17

18 REPORTED BY:

19 REBECCA A. KIDDER

20 State Wide Reporters

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION

OLIVIA Y., ET AL

PLAINTIFFS

VS.

CIVIL ACTION NO. 3:04CV251LN

HALEY BARBOUR, ET AL

DEFENDANTS

COPY

## DEPOSITION OF BILLY MANGOLD

Taken at Bradley Arant Rose & White,  
188 East Capitol Street, Suite 450,  
Jackson, Mississippi, on Monday,  
May 16, 2005, beginning at 10:45 a.m.

REPORTED BY:

CELESTE O. WERKHEISER, RMR

## State-Wide Reporters

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OLIVIA Y., ET AL PLAINTEIFFS  
VERSUS CIVIL ACTION NO. 3:04CV251LN  
HALEY BARBOUR, ET AL DEFENDANTS

Taken at Bradley, Arant,  
Rose & White,  
Jackson, Mississippi, on  
Thursday, June 2, 2005,  
beginning at 12:50 p.m.

ELISA M. MEDDERS, BCR, CSR #1670  
State-Wide Reporters  
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Suite 160(39211)  
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Jackson, Mississippi 39236  
Telephone: (601) 366-9676  
Fax: (601) 366-9756

Kathy Triplett, 6/14/05

1

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
3                   JACKSON DIVISION

4 OLIVIA Y., ET AL.,

5   PLAINTIFFS

6                   VS.

NO. 3:04CV251LN

7 HALEY BARBOUR, AS GOVERNOR OF  
8 THE STATE OF MISSISSIPPI, ET  
AL.,

DEFENDANTS

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10                   DEPOSITION OF MS. KATHY TRIPLETT

11                   Taken by the Plaintiffs at the offices of Bradley  
12                   Arant Rose & White located in Jackson, Mississippi  
beginning at 10:00 a.m. on Tuesday, June 14, 2005.

13                   COPY

14                   APPEARANCES:

15                   Representing the Plaintiff(s):

16                   ERIC E. THOMPSON, ESQ.  
17                   Tara S. Crean, ESQ.  
18                   Children's Rights, Inc.  
404 Park Avenue South  
New York, New York 10016

19                   Representing the Defendant(s):

20                   RUSTY FORTENBERRY, ESQ.  
21                   McGlinchey Stafford, PLLC  
22                   200 South Lamar Street, Ste. 1100  
Jackson, MS 39201

23  
24                   REPORTED BY: BARBARA L. CRAWFORD, CSR #1182  
25                   Metro Court Reporting Services  
709 Windward Road  
Jackson, MS 39206

Ms. Nancy Meaders, 6/14/05

1

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION

OLIVIA Y., ET AL.,

PLAINTIFFS

vs.

NO. 3:04CV251LN

HALEY BARBOUR, AS GOVERNOR OF  
THE STATE OF MISSISSIPPI, ET  
AL.,

DEFENDANTS

DEPOSITION OF MS. NANCY MEADERS

Taken by the Plaintiffs at the offices of Bradley  
Arant Rose & White located in Jackson, Mississippi  
beginning at 2:50 p.m. on Tuesday, June 14, 2005.

COPY

APPEARANCES:

Representing the Plaintiff(s):

ERIC E. THOMPSON, ESQ.  
Tara S. Crean, ESQ.  
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404 Park Avenue South  
New York, New York 10016

Representing the Defendant(s):

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McGlinchey Stafford, PLLC  
200 South Lamar Street, Ste. 1100  
Jackson, MS 39201

REPORTED BY: BARBARA L. CRAWFORD, CSR #1182  
Metro Court Reporting Services  
709 Windward Road  
Jackson, MS 39206

COMPUTER-AIDED TRANSCRIPTION BY  
METRO REPORTING (601) 368-9616

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<p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI 3 JACKSON DIVISION</p> <p>4 OLIVIA Y., ET AL, 5 Plaintiffs, 6 V. CIVIL ACTION NO. 3:04CV251LN 7 HALEY BARBOUR, ET AL, 8 Defendants.</p> <p>9 10 DEPOSITION OF GAIL YOUNG</p> <p>11 Taken at the law offices of Bradley, 12 Arant, Rose &amp; White, located at One 13 Jackson Place, 188 E. Capitol Street, Suite 450, on Wednesday, June 15, 2005, beginning at 8:33 a.m.</p> <p>14 15 16 REPORTED BY: 17 SANDI L. SUAREZ, RPR, CSR #1301 State-Wide Reporters, 18 A LegalLink Company Post Office Box 14113 (39236) 19 4400 Old Canton Road, Suite 160 Jackson, Mississippi 39211 20 Telephone: (601) 366-9676 Fax: (601) 366-9756</p> <p>21 Biloxi Office: 22 764 Water Street Biloxi, Mississippi 39530 23 Telephone: (228) 432-0770 Fax: (228) 432-0690</p> <p>24 1(800)372-DEPO 25 www.legalink.com</p>	<p>1 INDEX</p> <p>2 WITNESS: Gail Young PAGE:</p> <p>3 EXAMINATION BY:</p> <p>4 Ms. Crean 6</p> <p>5 EXHIBITS</p> <p>6 Exhibit No. 69, 10 Individual Service Plan, Bates 7 No. NP 4560 through 4563.</p> <p>8 Exhibit No. 70, 12 Policy Pages From Volume IV 9 Manual</p> <p>10 Exhibit No. 71, 19 Mississippi Department Of 11 Human Services, Office Of Social Services, Custody 12 Case Plan</p> <p>13 Exhibit No. 72, 42 Policy Manual Page, Bates 14 Stamped DHS 418</p> <p>15 Exhibit No. 73, 50 Service Plan, Bates Stamped 16 NP 3421 and 3422</p> <p>17 Exhibit No. 74, 52 From 445 Service Plan, 18 Bates Stamped NP 3424</p> <p>19 Exhibit No. 75, 53 Form 446A, Case Service Plan 20 Supplement, Bates Stamped NP 3425</p> <p>21 Exhibit No. 76, 74 Issues Observed During The 22 Foster Care Review, Bates 23 Stamped DHS 14050</p> <p>24 Exhibit No. 77, 81 Policy Manual Excerpts, Bates 25 Stamped DHS 363 Through DHS 402</p>
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<p>1 APPEARANCES:</p> <p>2 TARA S. CREAN, ESQUIRE 3 ERIC E. THOMPSON, ESQUIRE Children's Rights 4 404 Park Avenue South New York, New York 10016 5 Telephone: (212) 683-2210 ATTORNEY FOR PLAINTIFFS</p> <p>6 BETTY A. MALLET, ESQUIRE 7 McGlinchey Stafford, PLLC 8 Skytel Centre South, Suite 1100 200 South Lamar Street 9 Jackson, Mississippi 39201 Telephone: (601) 960-8400 ATTORNEY FOR DEFENDANTS</p> <p>10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 INDEX (Continued):</p> <p>2 Exhibit No. 78, 115 Policy Manual Pages</p> <p>3 Stipulations 5</p> <p>4 Certificate of Reporter 149</p> <p>5 Errata Sheet 150</p> <p>6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>



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<p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI 3 JACKSON DIVISION</p> <p>4 OLIVIA Y., ET AL, 5 Plaintiffs, 6 V. CIVIL ACTION NO. 3:04CV251LN 7 HALEY BARBOUR, ET AL, 8 Defendants.</p> <p>9 10 DEPOSITION OF KATHY TRIPLETT</p> <p>11 Taken at the law offices of Bradley, 12 Arant, Rose &amp; White, located at One 13 Jackson Place, 188 E. Capitol Street, 14 Suite 450, on Wednesday, June 15, 2005, 15 beginning at 1:41 p.m.</p> <p>16 REPORTED BY: 17 SANDI L. SUAREZ, RPR, CSR #1301 18 State-Wide Reporters, 19 A LegalLink Company 20 Post Office Box 14113 (39236) 21 4400 Old Canton Road, Suite 160 22 Jackson, Mississippi 39211 23 Telephone: (601) 366-9676 24 Fax: (601) 366-9756</p> <p>25 Biloxi Office: 764 Water Street Biloxi, Mississippi 39530 Telephone: (228) 432-0770 Fax: (228) 432-0690</p> <p>1(800)372-DEPO www.legalink.com</p>	<p>1 INDEX</p> <p>2 WITNESS: Kathy Triplett PAGE:</p> <p>3 EXAMINATION BY:</p> <p>4 Ms. Crean 5</p> <p>5 EXHIBITS</p> <p>6 Exhibit No. 79, 35 MDHS DFCS CFSR Program Improvement 7 Plan, March 24th, 2005, Bates 8 Stamped DHS 38159 through DHS 38248</p> <p>9 Exhibit No. 80, 76 Excerpts From The Family 10 And Children Services Policy Manual, Bates Stamped DHS 522 through DHS 529</p> <p>11 Stipulations 4 12 Certificate of Reporter 110 13 Errata Sheet 111</p> <p>14 15 16 17 18 19 20 21 22 23 24 25</p>
Page 2	Page 4
<p>1 APPEARANCES:</p> <p>2 TARA S. CREAN, ESQUIRE 3 ERIC E. THOMPSON, ESQUIRE 4 Children's Rights 5 404 Park Avenue South New York, New York 10016 6 Telephone: (212) 683-2210 ATTORNEY FOR PLAINTIFFS</p> <p>7 BETTY A. MALLET, ESQUIRE 8 McGlinchey Stafford, PLLC 9 Skytel Centre South, Suite 1100 200 South Lamar Street 10 Jackson, Mississippi 39201 11 Telephone: (601) 960-8400 12 ATTORNEY FOR DEFENDANTS</p> <p>13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 STIPULATION</p> <p>2 It is hereby stipulated and agreed by and 3 between the parties hereto, through their respective 4 attorneys of record, that this deposition may be 5 taken at the time and place hereinbefore set forth, 6 by SANDI L. SUAREZ, RPR, CSR, Court Reporter and 7 Notary Public, pursuant to the Federal Rules of 8 Civil Procedure, as amended;</p> <p>9 That the formality of READING AND SIGNING is 10 specifically RESERVED;</p> <p>11 That all objections, except as to the form of 12 the questions and the responsiveness of the 13 answers, are reserved until such time as this 14 deposition, or any part thereof, may be used or is 15 sought to be used in evidence.</p> <p>16 17 18 19 20 21 22 23 24 25</p>

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
3 JACKSON DIVISION

4 OLIVIA Y., ET AL

PLAINTIFFS

5 VS.

CIVIL ACTION NO. 3:04CV251LN

6 HALEY BARBOUR, ET AL

DEFENDANTS

7  
8 COPY  
9

10 DEPOSITION OF ROBERT HAMRICK  
11

12 Taken at Bradley Arant Rose & White,  
13 188 East Capitol Street, Suite 450,  
Jackson, Mississippi, on Monday,  
June 20, 2005, beginning at 8:30 a.m.  
14  
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20 REPORTED BY:

21 CELESTE O. WERKHEISER, RMR  
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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
3 JACKSON DIVISION

4 OLIVIA Y., ET AL

PLAINTIFFS

5 VS.

CIVIL ACTION NO. 3:04CV251LN

6 HALEY BARBOUR, ET AL

DEFENDANTS

7  
8 COPY  
9

10 DEPOSITION OF TERESSA JACKSON  
11

12 Taken at Bradley Arant Rose & White,  
13 188 East Capitol Street, Suite 450,  
Jackson, Mississippi, on Tuesday,  
June 21, 2005, beginning at 8:35 a.m.  
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20 REPORTED BY:

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION

OLIVIA Y., by and through her next friend,  
James D. Johnson; JAMISON J, by and through  
His next friend, Clara Lewis; DESIREE,  
RENEE, TYSON AND MONIQUE P., by and through  
Their next friend, Sylvia Forster; JOHN A.,  
By and through his next friend, James D. Johnson;  
CODY B, by and through his next friend, Sharon Scott;  
MARY, TOM, MATTHEW and DANA W, by and through their  
next friend, Zelatra W; and SAM H, by and  
through his next friend, Yvette Bullock;  
on their own behalf and on behalf of all others  
similarly situated

Plaintiffs,

CIVIL ACTION NO.  
3:04cv251LN

v.

HALEY BARBOUR, as Governor of the State  
Of Mississippi; DONALD TAYLOR, as Executive  
Director of the Department of Human Services;  
And BILLY MANGOLD, as Director of the  
Division of Family and Children's Services

Defendants.

\*\*\*\*\*

DEPOSITION OF MARTHA MCDANIEL

Taken at Bradley Arant Rose & White,  
One Jackson Place, Suite 450  
Jackson, Mississippi,  
on Wednesday, July 20, 2005,  
beginning at approximately 8:30 a.m.

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